

UNION PACIFIC RAILROAD COMPANY

ROOM 625  
1416 DODGE STREET  
OMAHA, NEBRASKA 68179



June 22, 1999

58026

ORIGINAL

DEPT OF TRANSPORTATION  
COMM  
99 JUN 23 PM 3:00

Dockets Management System  
U.S. Department of Transportation  
Room PL 401  
400 Seventh Street, SW  
Washington, DC 20590-0001

Re: Docket No. RSPA-99-5013 (HM229) <sup>-38</sup>

Dear Sir or Madam:

The attached comments of the F5800 Task Force are submitted to confirm their submission electronically yesterday, June 21, 1999.

If you have any questions, please contact me at 402-271-2345.

Very truly yours,

A handwritten signature in black ink, appearing to read "Patrick J. Student".

Patrick J. Student

Attachment

JUL 23 1999 PH 2: 35

58026

**F5800 Task Force**  
**Response to Questions**  
**Hazardous Materials: Revision to the**  
**Incident Reporting Requirements and**  
**the Detailed Hazardous Materials**  
**Incident Report DOT Form F5800.1**  
Docket No. RSPA-99-5013(HM-229) - 38

Before answering the questions in this notice, the members of the F5800 task force would like to emphasize that improvements to reporting and changes to Form DOT F5800.1 are crucial to solve the non-accident release problem regardless of mode. Any change proposed by RSPA will entail changes to companies internal systems for collecting information necessary to execute a Form DOT F5800.1, as well as training of those persons collecting this information. Further, detailed instructions to on completing the new form are important with this change.

The task force throughout its deliberations recognized that their proposed changes would incur cost to their companies and industries, as well as the agency. The parties believe these cost are balanced by achieving a reporting system that provides better, and more detailed information relating to the causes of incidents, This in turn will allow development of better action plans to attack the root cause of the problems and bring about a reduction of incidents with corresponding reduction in cost.

**General Issues**

1. **Yes.** It is suggested the reporting requirements be amended to reflect the reporting party as the party who is in physical control of the activities at the time the release occurs. Specifically, the reporting requirements should be changed to read as follows:

Each person shall report "each incident that occurs while a hazardous material is in its physical control during the course of transportation (including loading, unloading, and storage incidental to transportation)". By "person" the interested parties mean company, not the individual truck driver, train crew member, etc.

If this proposal is adopted by RSPA, a requirement for reporting will be placed on persons other than the carrier. RSPA should initiate a process to check that only one report is added to the database in the event both the carrier and the other person file a report on the same incident. Without this assurance, use of the database could be flawed, and corrective actions based on it could be wrong.

As there are other current dockets concerning jurisdictional issues, RSPA should maintain consistency of definitions among the various rulemakings.

2. Reporting undeclared shipments is outside the scope of this rulemaking. This is an enforcement and awareness issue. DOT and industry should discuss how we can work together to educate shippers and increase compliance with existing regulations.

### **Telephonic Notification**

3. Property damage by itself should not trigger immediate reporting.

There are two reasons for this suggestion. First, the remaining triggers are left in place, e.g., 5171.15(a)(1)(i), (ii), (iv), (v), and (vi). Second, property damage from similar incidents can vary widely, and as such there would be no consistency in reporting. Further, property damage is typically not determined until the incident is in the mitigation stage.

4. Other Federal laws require immediate notification. 49CFR171.15 should be expanded to include these requirements.

42USC11004(b) requires immediate local notification of transportation incidents involving certain specified materials. It is recommended that RSPA adopt these requirements and broaden them to include all hazardous materials

The Department of Labor's section on hazardous waste operations and emergency response specifically states "[r]esponses to incidental releases of hazardous substances where the substance can be absorbed, neutralized or otherwise controlled by employees in the immediate release area . . ." are not considered emergencies. DOT should not consider such incidental releases emergencies requiring immediate notification, either.

It needs to be recognized that only one immediate call at a time can be made. It is recommended that a hierarchy of local, then NRC calls be established.

There are times in which the circumstances of the incident are such that the agency to whom an immediate notification would be made is already aware of the incident and, contacts the party responsible for making the notification seeking information on the incident. In this case the party responsible for making the local notification should not have to make a telephone call.

Immediate notification to states and localities is increasingly a problem for carriers. Most states require some notification, some to multiple entities. In

virtually every case, all jurisdictions want "immediate" notification. The issue of "one call" notification has been discussed in other forums, but to no avail (The Stakeholders Want Change: Report of a Meeting on Improving the System-Hazardous Materials Accident Safety, EPA, January 1995, page 1). We are not **opposed** to providing immediate notification of transportation-related hazardous materials incidents. However, those subject to the "immediate notification" requirements of 5171.15 should be relieved of redundant, additional, and conflicting non-federal immediate notification requirements.

While this is a new regulation, it will reduce the burden of the responsible parties by standardizing the reporting requirements.

5. Yes. Releases of materials poisonous by inhalation should require immediate notification.
6. No. The carriers represented on the task force indicated the offeror of the hazardous materials shipment may be contacted as a business practice anytime there is an incident involving the shipment, but do not believe this should be made a regulatory requirement.
7. The person making the written report should be the one required to make the immediate telephone call. There is a direct correlation between this question and **Question number one (1)**. Consistency should be maintained in the reporting requirements. The task force believes that both telephonic notification and the written report should be handled by the party in physical control of the activities at the time of the release, since that party has the facts concerning the event.

### **Written Reports**

8. No. The task force recommends the following as not subject to the reporting requirements:

"Normally expected discharges" which occur during loading or unloading, including hose connecting and disconnecting operations; or

Discharges of argon, nitrogen, oxygen, or carbon dioxide from regulating valves during transportation.

These two changes would further clarify those situations when reporting does not need to be made.

9. No. Information on hazardous materials shipments involved in accidents is presently required to be reported by modal regulations, Safety Net for

transportation by highway and FRA reporting under Part 225 of 49CFR for transportation by rail.

10. Yes The exceptions in §171.16(c)(I) should be modified to include:

Adhesives, coating solution, and resin solution, and

Release of any class of materials in Packing Group III when shipped in a packaging of 20 liters (5.2 gallons) or less capacity for liquids; and for solids, a pail of 20 liters (5.2 gallons), and for other a packaging having a net capacity of 23 kilograms (50 pounds) or less.

Notes: The capacity of 20 liters (5.2 gallons) is specified because this volume is becoming the nominally accepted "5 gallon" capacity packaging. This change should also be made in current §171.16(c)(iii).

The recommendation for solids was derived from the values assigned to a non-bulk packaging for solids in §171.8, mass of 400 kilograms (882 pounds) or 450 liters (119) gallons. 20 liters is 0.04444 of 450 liters. Using this ratio gives 17.7777 kilograms or 39.15 pounds. However, the common weight for a bag near that amount is 23 kilograms (50 pounds) or less and is recommended that proportional weight be raised to this amount. Liquids simply have a volume limit regardless of the weight of the material. For reference a 20 liter packaging of water has a net weight of 19.64 kilograms (43.30 pounds).

These exceptions would reduce the burden of reporting non-bulk packaging failures involving de minimis quantities with limited risk. Expanding the exception from paint and paint related material to include adhesives and resin solution that do not meet the definition of any other hazard class have the same hazards as paint or paint related material and are packaged in a similar manner.

Further, the present exception for paint and paint related material as a Class 8 material should be removed. Because of the familiarity with paint as a Class 3 material, workers may confuse the properties and consequently be injured.

11. Yes. The trigger should be dependent on the hazard of the material. The task force agrees that there should be a "trigger" quantity, but after extensive discussions could not suggest a "quantity" or "quantities".

#### **DOT Form F 5800.1**

12. Yes. A tiered approach should be utilized for incident reporting. All reportable

incidents should require a base or "census" form to be filed. A single form (draft attached, Attachment A) is proposed. The "census" form would include Sections I and V.

The base or "census" form would be used only for all transportation incidents, including those situations where a written report is required but there has been no release of hazardous materials. . In cases where a non-bulk package fails for reasons other than handling or from "improper" loading of it or other freight in a transport vehicle, and in all cases involving bulk transportation of hazardous materials, a longer, more descriptive form would be required. In addition to the reporting requirements presently found in 5171 .16 (d)(I), (2), and (3); we recommend the addition of the following new requirements as additional triggers for the comprehensive report:

- (1) Occurred as a result of a bulk or intermediate bulk container transportation accident or incident; or
- (2) Involved the release of a material poisonous by inhalation.

The task force believes that by making this change RSPA will be reducing the burden of reporting by establishing a short form for low severity incidents.

13. Yes. The current form does not provide sufficient detailed data with respect to packaging information for non-bulk packages, and package failure information for bulk packages. We recommend that a system of numeric cause codes be developed specific to non-bulk and intermediate bulk packaging, cargo tanks, and tank cars. A preliminary list of cause codes is attached (Attachment B), but would require additional development, if our proposal is adopted. (The task force is willing to help the agency develop and define additional cause codes.) These cause codes would serve as a basis for causal analysis, which is an integral part of the development of corrective action plans and aid in reduction and prevention efforts.

With respect to the second part of this question, the task force believes there is no benefit in assigning specific human causal factors to hazardous material incidents. Although there is a degree of human failure involved in almost every hazardous material release, the intent of a cause code system, is not to assign blame or responsibility for the incident. Rather, the cause code system is intended as an analytical tool to provide a clearer understanding of the "root" cause of a given incident.

14. Yes. Replacing the existing check boxes with numerically coded responses could conceivably increase the difficulty and length of time it takes to complete the

written report. The burden created would be outweighed by usefulness of the data format for analytical purposes. It also has the added value of lending itself to electronic data submission.

15. Yes. Again, replacing the existing check boxes with numerically coded responses could possibly increase the difficulty and length of time it takes to complete the report. However, we believe the burden is far outweighed by the benefit of capturing more meaningful data.

Changes to these fields are necessary to allow shippers and carriers to understand the root cause of failures and implement improvements in packaging which will prevent future releases and reduce the potential for injury from exposure to a released hazardous material.

16. There are several reasons why actual amount is difficult, if not impossible to obtain. The task force recommends keeping the field giving the capacity of the package, and adding a field to indicate that the shipment was a residue according to 5171.8.

The offeror of a loaded bulk package shipment only has to give some indication of the quantity, e.g., 1 tank car, 1 cargo tank, §172.202(a)(5). A residue shipment is "the hazardous material remaining in a packaging including a tank car,, after its contents have been unloaded to the maximum extent practicable, and is also covered under §172.202(a)(5). Further, thermal expansion of many commodities makes it difficult determine how much material was loaded in the package.

17. **Yes.** However, simply changing the titles of the columns is merely a first step. Further enhancement needed to this section is addressed in answer to Question 18.

18. Yes. There should be separate sections for reporting bulk and non-bulk packaging information.

Additionally there should be a separate section for reporting intermediate bulk container packaging information

The present form lacks specificity of cause of failure. Separation of the information would provide a clearer, more concise, description of the specific areas of packaging failure. These changes are necessary to facilitate root cause analysis, implement improvements in packaging, and prevent future releases.

19. **Yes!;** The key to this question is availability of information. Various task force

members have identified location identifiers that are of value from an analytical perspective. If available, the data should be reported, not mandated, as it is useful in risk management.

20. The existing form should be changed to allow for numerically coded responses. This, coupled with the changes identified in question 19, provides the ability to definitively determine the facts of a release.
21. Yes. The injury data should be updated if an injury becomes a fatality within one year of the incident.

No. With respect to the remainder of the sections identified, the task force does not believe that a majority of the hazardous material incidents reported would require updating because the quantities released are minimal. We feel the small percentage that would qualify does not warrant a regulatory requirement for updating.

22. This should be part of the narrative. The instructions for executing the form should contain guidance describing this as the period of time at which the release began or was discovered until the emergency phase is officially declared over.
23. This too should be part of the narrative and it may of necessity be general in nature. Collecting this type of information would delay mitigating the incident as well as exposing employees or responders unnecessarily. The typical response to the failure of a non-bulk packaging is to overpack the packaging.
24. As stated, "copies of photographs in your possession" could be a significant burden. Many incidents have literally hundreds of photographs taken in various formats, e.g., print, slide, digital or video; while others have none. Again, it is suggested that the instructions for executing the form should state that copies of photographs detailing the failure of the packaging, if available, should be filed with the form.
25. Yes. Information concerning the evacuation of the general public should be included on the incident report form. If an evacuation is ordered after the emergency has started, the narrative should contain a note of explanation as to the reason. If there was an evacuation with no release, only the "census" form should be executed.
26. Yes. Information concerning hospitalized and non-hospitalized injuries to employees, emergency responders, and non-employees should be included on the report form. This would alleviate the need for follow-up phone calls from the



DOT for this information. More specific information is required to be filed in the rail mode on form FRA **F6180-55a** – Railroad Injury and Illness Summary. Please see our response to question 28.

27. Yes. Packing Group information should be included on the incident report form. This data is used in the analytical process to track hazardous material releases and aid in prevention planning.
28. Yes. The rail carriers represented on the interested parties are required to report **accident** and injury information to the Federal Railroad Administration (FRA) on the following forms: FRA F 6180 - **55a** - Railroad Injury and Illness Summary; FRA F 6180 - 54 - Rail Equipment Accident/Incident Report; and FRA F - 57 - Rail-Highway Crossing Accident/incident Report. These reports contain a unique **identifying** number that could be included in a specified field on the form DOT 5800.1. These reports should be available to the Department of Transportation via an internal communication mechanism. Carriers of other modes could report similar federal report numbers in this same field, if applicable.
29. Data and information from the incident report form is used as an analytical tool for the development of action plans designed to reduce hazardous material releases and as an aid in prevention planning. The following data fields are most frequently used: Date, location of release (city, state), shipper, origin (city, state), destination (city, state), proper shipping name (commodity), hazard class, package specification, and package failure.

Furthermore, the changes recommended in these comments will assist those companies that adhere to the principles of Responsible Care, an initiative designed to foster continuous improvement in environmental, health and safety practices, and track their performance under the Distribution Code. DOT's incident database serves as the basis for tracking implementation of and adherence to the Responsible **Care®** Distribution Code by many chemical manufacturers and carriers.

30. Additional data that should be collected on the incident report form includes: Location: route/street/mile post/latitude & longitude/airport; EPA Manifest ID number; Residue (Y/N); Packing Group; Limited Quantity (Y/N); Non-Bulk Accident Causes; Evacuation Data, Fatality & Injury information (hospitalized & non-hospitalized) for employees, emergency responders, and other non-employees; **Accident Data:** Rail Type; **Package Failure:** Cause Code, Fitting/Valve Manufacturer, Model Number; Non-Bulk Packaging Information; Bulk Packaging Information: Head Thickness, Shell Thickness, Design Pressure, and Material of Construction.

By requiring the EPA Manifest ID #, the requirement of filing a copy of the manifest should be deleted. This is necessary to facilitate electronic filing.

This data, too, is useful in risk management.

31. While we recognize that it may be beneficial and a time savings, we believe that having data directly available via the internet would be problematic and could promote fraud. Incident specific information should not be posted on the Internet until 30 to 60 days after the incident.

The task force believes that any unrestricted information that is made available via Internet be summary information, and non-specific as to shipper and/or carrier. An Internet user would need a DOT registered user ID and password to access more specific information. Such an approach would allow tracking similar to a FOIA request.

32. Electronic filing should be an option, not a requirement. As there is no commercially available computer package for creating a Form DOT F5800.1, RSPA should develop a standard to accept the information in one of the commercially available data base packages such as Access™ or Paradox™, or tab-delimited text.

Filing electronically could be either sending in a diskette, or attaching a file in an e-mail.

RSPA should implement the ability for a carrier to submit Form DOT F5800.1 by fax immediately and not wait for resolution of this docket.

33. If by this question, the agency means, a system to follow the form after it has been submitted to the agency, the parties see no need for such a system. Only one of the parties indicated, that they have been contacted by the agency one time to request a resubmission of reports, as the original filing had been unexplainably lost after receipt.

The task force members all indicate that they have internal tracking systems. After an incident, necessary information is developed in a timely fashion so the form can be filed within the regulatory time frame.

### **National Transportation Safety Board (NTSB) Recommendations**

34. See answer to question 6.
35. See answer to question 9.

If you have any questions involving the comments or desire to contact the task force with regard to its offer to assist in developing cause codes and/or user instructions, please contact Pat Student at 402-271-2345.

The undersigned, while agreeing with these comments in general, reserve the right to file additional comments in this docket.

## Signatories

### **F5800 Task Force Response to Questions Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1 Docket No. RSPA-99-5013(HM-229)**

American Petroleum Institute  
1220 "L" Street, NW  
Washington IDC 20005  
Contact: Prentiss Seales  
202-682-8227

American Trucking Associations, Inc.  
2200 Mill Road  
Alexandria, VA 22314  
Contact: Paul Bomgardner  
703-838-1 849

Association of American Railroads/  
Transportation Technology Center  
PO Box 11130  
Pueblo, CO 81001  
Contact: Paul Williams  
719-585-1 881

Burlington Northern & Santa Fe Railway  
4200 Deen Road  
Fort Worth, TX 76106  
Contact: Pal Brady  
817-740-7358

Chemical Manufacturers Association  
1300 Wilson Boulevard  
Arlington, VA 22209  
Contact: Mike Heimowitz  
703-741-5255

Chlorine Institute, Inc.  
2001 "L" Street, NW  
Washington, DC 20036  
Contact: Mike Lyden  
202-872-4732

International Brotherhood of Teamsters  
25 Louisiana Avenue, NW  
Washington, DC 20001  
Contact: Scott Madar  
202-624-69160

National Tank Truck Carriers  
2200 Mill Road  
Alexandria, VA 22314  
Contact: Cliff Harvison  
703-838-1 960

Reusable Industrial Packaging Association  
8401 Corporate Drive, Suite 140  
Landover, MD 20875  
Contact: Dana Worcester  
301-577-6476

Roadway Express  
1077 Gorge Boulevard  
Akron, OH 44310  
Contact: Susan Camara  
330-643-6904

Spill Center, Inc.  
100 Powdermill Road, Suite 223  
Acton, MA 01720  
Contact: Tom Moses  
978-897-6461

Union Pacific Railroad  
1416 Dodge Street  
Omaha, NE 68179  
Contact: Patrick Student or Kay Houfek  
402-271-2345 or 402-271-3674

Yellow Freight Systems, Inc.  
PO Box 7270  
Overland Park, KS 66207  
Contact: Mike Windsor  
913-344-3057

## **Attachment A**

### **F5800 Task Force Response to Questions Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1 Docket No. RSPA-99-5013(HM-229)**

Note: The attached form is complete but for the ending bottom line.

DRAFT 2

## DEPARTMENT OF TRANSPORTATION HAZARDOUS MATERIALS INCIDENT REPORT

DRAFT 2

## I. CENSUS INFORMATION

DATE AND TIME OF INCIDENT OR FINDING

REPORT \_\_\_\_\_ OF \_\_\_\_\_

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_  
(Format MM/DD/CCYY) (Format Military Time - 24 Hour Clock)

LOCATION

CITY: \_\_\_\_\_

STATE: \_\_\_\_\_

COUNTY: \_\_\_\_\_

(Two letter alpha)

ADDITIONAL INFORMATION, IF AVAILABLE:

ROUTE OR STREET OR MILE POST OR LATITUDE &amp; LONGITUDE OR AIRPORT \_\_\_\_\_

REPORTING PARTY (Name &amp; address or reporting code, DOT census number, vessel name and ID number)

NAME: \_\_\_\_\_ CODE \_\_\_\_\_ OTHER FEDERAL REPORTING NUMBER \_\_\_\_\_

ADDRESS: \_\_\_\_\_ CITY/STATE \_\_\_\_\_

## SHIPMENT INFORMATION

SHIPPER: \_\_\_\_\_

SHIPPING PAPER

WAYBILL ID # \_\_\_\_\_

POINT OF ORIGIN

(City/State) \_\_\_\_\_

DESTINATION

(City/State) \_\_\_\_\_

EPA MANIFEST ID #

(If Applicable) \_\_\_\_\_

## HAZARDOUS MATERIAL SPILLED OR INVOLVED

PROPER SHIPPING NAME \_\_\_\_\_

RESIDUE (Y/N) \_\_\_\_\_

HAZARD CLASS \_\_\_\_\_  
(e.g. 3, 6.1, 8)

IDENTIFICATION NUMBER \_\_\_\_\_

(e.g. UN2398, NA1987)

PACKING GROUP \_\_\_\_\_

LIMITED QUANTITY (Y/N) \_\_\_\_\_

QUANTITY RELEASED (Specify Units e.g. gals., lbs., etc.) \_\_\_\_\_

WAS A REPORTABLE QUANTITY OF A HAZARDOUS SUBSTANCE RELEASED (Y/N)? \_\_\_\_\_

## RESULTS OF RELEASE

(List All Applicable)

- 1 = SPILLAGE      2 = VAPOR (GAS) DISPERSION      3 = FIRE      4 = EXPLOSION      5 = ENTERED WATERWAY/SEWER  
6 = ENVIRONMENTAL DAMAGE      7 = NO RELEASE, EVACUATION OF GENERAL PUBLIC      8 = NO RELEASE, MAJOR TRANSPORTATION ARTERY/FACILITY CLOSED  
9 = NO RELEASE, OPERATIONAL FLIGHT PATTERN/ROUTINE OF AIRCRAFT ALTERED      10 = OTHER (DESCRIBE) \_\_\_\_\_

## EVACUATION

GENERAL PUBLIC ONLY  
(Number) \_\_\_\_\_DURATION  
(Hours) \_\_\_\_\_

## FATALITIES

(Number of Each)

EMPLOYEES \_\_\_\_\_

NON-EMPLOYEES \_\_\_\_\_

RESPONDERS \_\_\_\_\_

## INJURIES

(Number of Each)

HOSPITALIZED  
(Admitted Only) \_\_\_\_\_NON-HOSPITALIZED  
(Off Site First Aid; Observation, Released) \_\_\_\_\_

EMPLOYEES \_\_\_\_\_

NON-EMPLOYEES \_\_\_\_\_

RESPONDERS \_\_\_\_\_

## MODE OF TRANSPORTATION

- 1 = AIR      2 = HIGHWAY      3 = RAIL  
4 = WATER      5 = U.S. MAIL

## TYPE OF VEHICLE

- 1 = CARGO TANK      2 = TANK CAR      3 = COVERED HOPPER      4 = TOFC/COFC      5 = OTHER RAIL CAR  
6 = VAN TRUCK/TRAILER      7 = FLATBED TRUCK/TRAILER      8 = AIRCRAFT      9 = BARGE      10 = SHIP

## TRANSPORTATION PHASE

- 1 = ENROUTE BETWEEN ORIGIN/DESTINATION      2 = LOADING      3 = UNLOADING      4 = TEMPORARY STORAGE

## NON BULK ACCIDENT CAUSE

(COMPLETE ONLY WHEN PACKAGE FAILURE RESULTED FROM FORCES NOT NORMALLY INCIDENT TO TRANSPORTATION)

SELECT A SINGLE CAUSE WHICH BEST DESCRIBES THE INCIDENT \_\_\_\_\_

- 1 = TRANSPORT VEHICLE ACCIDENT/DERAILMENT      2 = HEAVY FREIGHT LOADED ON TOP      3 = PUNCTURED BY TRAILER DEFECT      4 = PUNCTURED BY FORKLIFT  
5 = PUNCTURED BY OTHER FREIGHT      6 = PUNCTURED BY OTHER TOOLS/EQUIPMENT      7 = LOADED AGAINST ARROWS      8 = DAMAGED BY FALLING FREIGHT  
9 = VANDALISM      10 = LOAD SHIFTED      11 = DROPPED/FELL/CRUSHED      12 = PUNCTURED BY NAIL/PROTRUSION

**NOTE: IF INCIDENT MEETS ANY OF THE CRITERIA DEFINED IN 49CFR 171.16, COMPLETE ENTIRE FORM. IF NOT, GO TO SECTION V.**

## ACCIDENT DATA

WAS THE SPILL THE RESULT OF A VEHICLE ACCIDENT/DERAILMENT? (Y/N) \_\_\_\_\_  
IF VEHICLE ACCIDENT, COMPLETE SECTIONS A, B, & C. IF DERAILMENT, COMPLETE SECTIONS A & D.

A. ESTIMATED SPEED (MPH) \_\_\_\_\_

B. HIGHWAY TYPE \_\_\_\_\_

- 1 = DIVIDED/LIMITED ACCESS      2 = UNDIVIDED  
3 = DIVIDED NOT LIMITED ACCESS

C. TOTAL NUMBER OF LANES \_\_\_\_\_

- 1 = ONE      2 = TWO  
3 = THREE      4 = FOUR OR MORE

D. TRACK/NE \_\_\_\_\_

- 1 = MAIN LINE, SINGLE TRACK      2 = MAIN LINE, DOUBLE TRACK  
3 = SIDING      4 = YARD  
5 = INDUSTRIAL/PIANT

## II. PACKAGING INFORMATION

### PACKAGE FAILURE

COMPLETE BELOW ONLY FOR FITTING AND/OR VALVE FAILURES

CAUSE CODE

( Required - See Appendix A)

FITTING/VALVE MANUFACTURER (Brand) \_\_\_\_\_

MODEL NUMBER \_\_\_\_\_

### NON BULK PACKAGING INFORMATION

PACKAGE SPECIFICATION/PERFORMANCE MANUFACTURERS MARKINGS (INCLUDING THICKNESS) \_\_\_\_\_  
( e.g. UN1 A1/Y 1.2/1 50/97/USA/M0000/98 R L 1.2/0.9/1.2)

IF NO SPECIFICATIONS OR MARKINGS AVAILABLE. IDENTIFY  
TYPE AND MATERIAL OF OUTER PACKAGING

IF INNER PACKAGING, TYPE AND MATERIAL

I. \_\_\_\_\_

II. \_\_\_\_\_

III. \_\_\_\_\_

I. \_\_\_\_\_

II. \_\_\_\_\_

1 = DRUM  
2 = WOOD BARREL  
3 = JERRICAN  
4 = BOX  
5 = BAG  
6 = COMPOSITE PACKAGING  
7 = PRESSURE RECEPTACLE

A = STEEL  
B = ALUMINUM  
C = NATURAL WOOD  
D = PLYWOOD  
E = RECONSTRUCTED WOOD  
F = FIBERBOARD  
G = PLASTIC  
H = TEXTILE  
I = PAPER, MULTIWALL  
J = METAL, OTHER THAN A OR B  
K = GLASS, PORCELAIN, STONEWARE

a = OPEN HEAD  
b = CLOSED (TIGHT) HEAD

1 = BOTTLE  
2 = CAN  
3 = BOX  
4 = BAG  
5 = CYLINDER

A = METAL (ANY TYPE)  
B = GLASS, PORCELAIN, STONEWARE  
C = PLASTIC  
D = FIBERBOARD, CARDBOARD  
E = WOOD, RECONSTRUCTED WOOD, PLYWOOD

CAPACITY OF OUTER PACKAGING \_\_\_\_\_

### INTERMEDIATE BULK PACKAGING INFORMATION

CAUSE CODE

(Required - See Appendix A)

PACKAGE SPECIFICATION/PERFORMANCE MANUFACTURERS MARKINGS (INCLUDEING THICKNESS)

### BULK PACKAGING INFORMATION

SERIAL NUMBER/REPORTING MARKS \_\_\_\_\_

PACKAGE SPECIFICATIONS \_\_\_\_\_

CAPACITY/WEIGHT \_\_\_\_\_  
(e.g. load capacity, tare, gross)

EXEMPTION/APPROVAL/COMPETENT  
AUTHORITY NUMBER, IF APPLICABLE (e.g. DOTE 1012) \_\_\_\_\_

COMPLETE BELOW FOR ACCIDENT RELEASE ONLY

HEAD  
THICKNESS (units) \_\_\_\_\_

SHELL  
THICKNESS (units) \_\_\_\_\_

DESIGN  
PRESSURE (psig) \_\_\_\_\_

MATERIAL OF  
CONSTRUCTION \_\_\_\_\_

## III. ADDITIONAL INFORMATION

ESTIMATED DAMAGES ( Show as dollars. Complete only when TOTAL damages exceed \$50,000)

PRODUCT LOSS \_\_\_\_\_ CARRIER DAMAGE \_\_\_\_\_

PUBLIC-  
PRIVATE PROPERTY DAMAGE \_\_\_\_\_

DECONTAMINATION/  
CLEANUP \_\_\_\_\_

## IV. DESCRIPTION OF INCIDENT

NARRATIVE DESCRIPTION OF THE INCIDENT Detailed description of what cause the incident and action taken to resolve the incident.

## V. SUBMISSION INFORMATION

PERSON REPORTING INCIDENT

SIGNATURE

TITLE

TELEPHONE NUMBER INCLUDING AREA CODE

DATE REPORT SIGNED

## **Attachment B**

### **F5800 Task Force Response to Questions Hazardous Materials: Revision to the Incident Reporting Requirements and the Detailed Hazardous Materials Incident Report DOT Form F5800.1 Docket No. RSPA-99-5013(HM-229)**

## **Sample Cause Codes**

### **Non-Bulk & Intermediate Bulk Containers (IBC):**

- 010 Forklift Punctured
- 011 Nail/Protrusion Punctured
- 012 Other Freight Punctured
- 013 Other Tool Punctured
- 014 Metal/Plastic Fatigue
- 015 Packaging Failure
- 016 Top Loaded Freight Crushed
- 017 Load Shift/Blocking and Bracing Failed
- 018 Load Shift/No Blocking and Bracing
- 019 Dropped/Fell
- 020 Fire/Heat Rupture/Burst
- 021 Freezing Rupture/Burst
- 022 Rubbing/Abrasion
- 023 Loose Lid/Bung/Closure
- 024 Vandalism
- 025 Container lining damaged/defective
- 026 Container jacket failed
- 027 Leaking at the vent due to problem with gasket
- 028 Leaking at bolted flange due to problem with gasket
- 029 Leaking past threaded connections in vent
- 030 Leaking past threaded connections at relief valve
- 031 Leaking past threaded connections at gauges
- 032 Leaking at relief valve due to over pressure
- 033 Leaking at valve stem
- 034 leaking at valve seat
- 035 Leaking through packing
- 036 Manway leaking due to a problem with gasket
- 037 Manway leaking due to a problem with bolts
- 038 Leaking due to broken/defective vacuum relief valve
- 039 Vacuum relief valve leaking due to defective o-rings
- 040 Safety relief valve leaking past gasket connection to car



- 041** Safety relief valve leaking through valve seat/bent or broken stem
- 042** Safety relief valve leaking through valve seat/overloaded tank
- 043** Safety relief valve leaking as valve opens to release over pressure
- 044** Leaking due to defective/misaligned o-rings
  
- 045** Leaking due to broken/defective safety relief valve
- 046** Bottom outlet valve leaking past threaded cap
- 047** Bottom outlet valve leaking past threaded plug
- 048** Bottom outlet valve leaking directly out of valve stem
- 049 Bottom outlet valve cap gasket missing/defective
- 050** Bottom outlet valve **securement/valve** open
- 051** Top operated bottom outlet valve leaking due to loose packing gland nut
- 052** Slip tube gauging device **securement/leaking** at flange
- 053** Slip tube gauging device **securement/leaking** at base of fitting
- 054** Slip tube gauging device **securement/leaking** at packing gland nut
- 055** Slip tube gauging device leaking through packing
- 056** Slip tube gauging device **securement/leaking** at needle valve plug
- 057** Heater coils cap **securement/leaking** from inlet or outlet pipes
- 058** Heater coils leaking due to damaged coils
- 059 Tank leaking due to defective weld/seam
- 060** Tank leaking/product incompatible

## **Cargo Tanks**

- 110 Leaking at the dome cover due to problem gasket
- 111 Leaking at the vent due to problem with gasket
- 112 Leaking at bolted flange due to problem with gasket
- 113** Leaking at product transfer hoses due problem with gasket
- 114** Leaking at product transfer pipes due to problem with gasket
- 115** Leaking at product transfer pump due to problem with gasket
- 116** Leaking at product transfer blower due to problem with gasket
- 117** Leaking past threaded connections in vent
- 118** Leaking past threaded connections in clean-out openings
- 119 Leaking past threaded connections at relief valve
- 120 Leaking past threaded connections at gauges
- 121 Leaking at relief valve due to over pressure
- 122 Leaking at product transfer device due to over pressure
- 123 **Leaking** due to burst frangible disk
- 124 Leaking at valve stem
- 125 leaking at valve seat
- 126 Leaking through packing
- 131 **Vandalism**

## **Tank Cars**

- 211 **Manway** leaking due to missing gasket
- 212 **Manway** leaking due to misaligned gasket
- 213 **Manway** leaking due to deteriorated gasket
- 214 **Manway** leaking due to loose bolts
- 215 **Manway** leaking due to missing bolts
- 216 **Manway** leaking due to broken bolts
- 217 Fill hole cover leaking due to missing gasket
- 218 Fill hole cover leaking due to misaligned gasket
- 219 Fill hole cover leaking due to deteriorated gasket
- 220 Fill hole cover leaking due to loose bolts
- 221 Fill hole cover leaking due to missing bolts
- 222 Fill hole cover leaking due to broken bolts
- 223 Fill hole cover locking bar loose
- 224 Vacuum relief valve leaking past pipe threads
- 225 Vacuum relief valve leaking through valve under cap
- 226 **Leaking** due to broken/defective vacuum relief valve
- 227 Vacuum relief valve leaking due to defective o-rings
- 228 Vacuum relief valve bumped or damaged in an accident
- 229 Vacuum relief valve torn off in an accident
- 230 Vacuum relief valve leaking due to rollover in accident
- 231 Safety relief valve leaking past gasket connection to car
- 232 Safety relief valve leaking through valve seat/bent or broken stem
- 233 Safety relief valve leaking through valve seat/overloaded tank
- 234 Safety relief valve leaking as valve opens to release over pressure
- 235 Leaking due to defective/misaligned o-rings
- 236 Leaking due to broken/defective safety relief valve
- 237 Safety relief valve bumped or damaged in an accident
- 238 Safety relief valve torn off in an accident
- 239 Safety relief valve released due to rollover in accident
- 241 Safety vent leaking due to burst frangible disk
- 242 Safety vent leaking past application of vent to car
- 243 Safety vent leaking due to missing frangible disk
- 244 Safety vent leaking due to misapplied frangible disk
- 245 Safety vent leaking due to corroded frangible disk
- 246 Safety vent bumped or damaged in an accident
- 247 Safety vent torn off in an accident
- 248 Safety vent burst due to rollover in accident
  
- 251 Threaded liquid valve leaking where valve screws to car
- 252 **Threaded** liquid valve leaking past threaded plug
- 253 **Threaded** liquid valve **securement/leak** stops when valve is closed
- 254 Threaded liquid valve defective/leak continues when valve is closed
- 255 Threaded liquid valve leaking directly out of valve stem
- 256 Threaded liquid valve bumped or damaged in an accident

257 Threaded liquid valve torn off in an accident  
261 Bolted liquid valve leaking where valve is bolted to car  
262 Bolted liquid valve leaking past tapped flange on top of the valve  
263 Bolted liquid valve **securement/leaking** leak stops when valve closed  
264 **Bolted** liquid valve defective/leak continues when valve is closed  
265 **Bolted** liquid valve leaking directly out of valve stem  
266 **Bolted** liquid valve bumped or damaged in an accident  
267 **Bolted** liquid valve torn off in an accident  
271 Bottom outlet valve leaking at the blind flange  
272 Bottom outlet valve leaking where nozzle bolts to valve  
273 Bottom outlet valve leaking past threaded cap  
274 Bottom outlet valve leaking past threaded plug  
275 Bottom outlet valve leaking directly out of valve stem  
276 Bottom outlet valve cap gasket missing/defective  
277 Bottom outlet valve **securement/valve** open  
278 Top operated bottom outlet valve leaking due to loose packing gland nut  
279 Top operated bottom outlet valve leaking due to defective/missing gasket  
281 Slip tube gauging device **securement/leaking** at flange  
282 Slip tube gauging device **securement/leaking** at base of fitting  
283 Slip tube gauging device **securement/leaking** at packing gland nut  
284 Slip tube gauging device leaking through packing  
285 Slip tube gauging device **securement/leaking** at needle valve plug  
286 Magnetic gauging device leaking from base of device cover/broken pipe  
287 Tape type gauging device **securement/leaking** between seal on device/manway cover plate  
288 Gauging device bumped or damaged in an accident  
289 Gauging device torn off in an accident  
291 Sample line leaking where needle valve screws on pipe nipple  
292 Sample line leaking where pipe plug crews into needle valve  
293 Sample line needle valve **securement/leak** stops when valve is closed  
294 Sample line needle valve defective/leak continues when valve is closed  
295 Sample line leaking where pipe nipple screws into pressure head  
296 Sample line leaking due to broken pipe nipple  
297 Sample line leaking directly out of needle valve  
298 Sample line bumped or damaged in an accident  
299 Sample line torn off in an accident  
301 Liquid line flange leaking at flange nuts  
302 Liquid line flange leaking due to missing/defective gasket  
303 Thermometer well cap leaking/damaged thermometer well pipe  
304 Thermometer well cap leaking/missing or defective o-ring in cap  
305 Thermometer well leaking between nipple and **manway** cover/damaged thermometer well pipe  
306 Thermometer well leaking due to broken well nipple  
307 **Thermometer** well bumped or damaged in an accident  
308 **Thermometer** will torn off in an accident  
309 Vapor valve bumped or damaged in an accident

- 310 Vapor valve torn off in an accident
- 311 Heater coils cap securement/leaking from inlet or outlet pipes
- 312 Heater coils leaking due to damaged coils
- 313 Washout leaking around seal between tank and washout plate
- 314 Washout leaking from plug in washout plate/tell-tale plug securement
- 315 Leaking at sump/defective or damaged sump
- 316 Bottom fitting bumped or damaged in accident
- 317 Bottom fitting torn off in accident
- 321 Tank leaking/jacketed car – cause undetermined
- 322 Tank leaking due to defective weld/seam
- 323 Tank leaking/rubber liner failed
- 324 Tank leaking/liner cracked/defective
- 325 Tank leaking/product incompatible
- 326 Tank leaking/head punctured or torn in accident
- 327 Tank leaking/shell punctured or torn in accident
- 328 Tank leaking due to stub sill separation from tank
- 329 Tank leaking due to parent metal crack or failure in shell
- 330 Tank leaking due to parent metal crack or failure in head
- 331 Tank explosion/BLEVE
- 341 Commodity self-ignited – initiating event
- 342 Commodity polymerized
- 343 Vandalism